

HHS Privacy Impact Assessment (PIA) Summary

AOA: AoA Alzheimers Website

1

The following required questions represent the information necessary to complete the PIA Summary for transmission to the Office of Management and Budget. Note: If a question or its response is not applicable, please answer “No” to that question.

2Summary of PIA Required Questions

Question	Response
1 System:	AoA Alzheimers Website
2 Is this a new PIA?	No
3 If this is an existing PIA, please provide a reason for revision:	Initial PIA Migration to ProSight
4 Date of this Submission:	Feb 17, 2005
5 OPDIV Name:	AOA
6 Unique Project Identifier (UPI) Number:	009-75-01-07-02-1005-00-305-109
7 Privacy Act System of Records (SOR) Number:	No
8 OMB Information Collection Approval Number:	No
9 Other Identifying Number(s):	No
10 System Name:	Alzheimer Website
11 System Point of Contact (POC). The System POC is the person to whom questions about the system and the responses to this PIA may be addressed:	Sue Banning
12 Provide an overview of the system:	The Alzheimers Website is a resource where families, caregivers, and professionals can find information about The Alzheimer's Demonstration Program, including: where you can turn for support and assistance, and providing services to caregivers. The progra Existing
13 Indicate if the system is new or an existing one being modified:	
14 Does/Will the system collect, maintain (store), disseminate and/or pass through IIF within any database(s), record(s), file(s) or website(s) hosted by this system?	No
15 Is the system subject to the Privacy Act?	No
16 If the system shares or discloses IIF please specify with whom and for what purpose(s):	The system does not collect information in identifiable form.
17 Describe in detail the information the agency will collect, maintain, or disseminate and why and for what purpose the agency will use the information:	The system does not collect information.
18 Describe the consent process:	The system does not collect information.
19 Does the system host a website?	Yes
20 Does the website have any information or pages directed at children under the age of thirteen?	No
21 Are there policies or guidelines in place with regard to the retention and destruction of IIF?	Yes
22 Are there technical controls present?	Yes
23 Describe the IIF security controls:	The system does not collect information in identifiable form.
24 Sr Official of Privacy Signature:	Harry Posman
25 Sr Official of Privacy Signoff Date:	Jul 5, 2006

Note on IIF: Any question about IIF seeks to identify any, and all, personal information associated with the system. This includes any IIF, whether or not it is subject to the Privacy Act, whether the individuals are employees, the public, research subjects, or business partners, and whether provided voluntarily or collected by mandate. Later questions will try to understand the character of the data and its applicability to the requirements under the Privacy Act or other legislation. Note: If no IIF is contained in the system, please answer the remaining required questions, then promote the PIA to the Sr. Privacy Official who will authorize the PIA. Note: If this system contains IIF, all remaining questions on the PIA Form Tabs must be completed prior to signature and promotion.

HHS Privacy Impact Assessment (PIA) Summary

AOA: AoA Eldercare Locator Web Application

1

The following required questions represent the information necessary to complete the PIA Summary for transmission to the Office of Management and Budget. Note: If a question or its response is not applicable, please answer “No” to that question.

2

Summary of PIA Required Questions

Question

Response

- 1 System:

AoA Eldercare Locator Web Application
- 2 Is this a new PIA?

No
- 3 If this is an existing PIA, please provide a reason for revision:

Initial PIA Migration to ProSight
- 4 Date of this Submission:

Feb 17, 2005
- 5 OPDIV Name:

AOA
- 6 Unique Project Identifier (UPI) Number:

009-75-01-07-02-1005-00-305-109
- 7 Privacy Act System of Records (SOR) Number:

No
- 8 OMB Information Collection Approval Number:

No
- 9 Other Identifying Number(s):

No
- 10 System Name:

Eldercare Locator
- 11 System Point of Contact (POC). The System POC is the person to whom questions about the system and the responses to this PIA may be addressed:

Sue Banning
- 12 Provide an overview of the system:

The Eldercare Locator is a public service offered by AoA. The website connects older Americans and their caregivers with sources of information on senior services. The service links those who need assistance with state and local area agencies on aging and Existing
- 13 Indicate if the system is new or an existing one being modified:

No
- 14 Does/Will the system collect, maintain (store), disseminate and/or pass through IIF within any database(s), record(s), file(s) or website(s) hosted by this system?

No
- 15 Is the system subject to the Privacy Act?

No
- 16 If the system shares or discloses IIF please specify with whom and for what purpose(s):

No IIF is collected.
- 17 Describe in detail the information the agency will collect, maintain, or disseminate and why and for what purpose the agency will use the information:

The Eldercare Locator data is contact information (address, phone number, e-mail) for state and local eldercare services ranging from general information, health insurance, legal assistance, long term care Ombudsman, and prescription assistance. There is No IIF is collected.
- 18 Describe the consent process:

Yes
- 19 Does the system host a website?

No
- 20 Does the website have any information or pages directed at children under the age of thirteen?

No
- 21 Are there policies or guidelines in place with regard to the retention and destruction of IIF?

Yes
- 22 Are there technical controls present?

Yes
- 23 Describe the IIF security controls:

No IIF is collected.
- 24 Sr Official of Privacy Signature:

Harry Posman
- 25 Sr Official of Privacy Signoff Date:

Jul 5, 2006

Note on IIF: Any question about IIF seeks to identify any, and all, personal information associated with the system. This includes any IIF, whether or not it is subject to the Privacy Act, whether the individuals are employees, the public, research subjects, or business partners, and whether provided voluntarily or collected by mandate. Later questions will try to understand the character of the data and its applicability to the requirements under the Privacy Act or other legislation. Note: If no IIF is contained in the system, please answer the remaining required questions, then promote the PIA to the Sr. Privacy Official who will authorize the PIA. Note: If this system contains IIF, all remaining questions on the PIA Form Tabs must be completed prior to signature and promotion.

HHS Privacy Impact Assessment (PIA) Summary

AOA: AoA Formula Grants System (FGS)

1

The following required questions represent the information necessary to complete the PIA Summary for transmission to the Office of Management and Budget. Note: If a question or its response is not applicable, please answer “No” to that question.

2

Summary of PIA Required Questions

Question	Response
1 System:	AoA Formula Grants System (FGS)
2 Is this a new PIA?	No
3 If this is an existing PIA, please provide a reason for revision:	Initial PIA Migration to ProSight
4 Date of this Submission:	Feb 22, 2005
5 OPDIV Name:	AOA
6 Unique Project Identifier (UPI) Number:	2004- 009-75-04-01-02-1001-00; (2005-009-75-04-00-02-1001-00-207-087)
7 Privacy Act System of Records (SOR) Number:	N/A
8 OMB Information Collection Approval Number:	N/A
9 Other Identifying Number(s):	N/A
10 System Name:	Formula Grants System (FGS)
11 System Point of Contact (POC). The System POC is the person to whom questions about the system and the responses to this PIA may be addressed:	Sue Banning
12 Provide an overview of the system:	The system is a repository of legacy data of the solicitation, review, award and post-award monitoring for grants funded under the Older Americans Act (OAA) prior to AoA's transition to GATES.
13 Indicate if the system is new or an existing one being modified:	Existing
14 Does/Will the system collect, maintain (store), disseminate and/or pass through IIF within any database(s), record(s), file(s) or website(s) hosted by this system?	Yes
15 Is the system subject to the Privacy Act?	No
16 If the system shares or discloses IIF please specify with whom and for what purpose(s):	The system shares contact information on grant applications internally with AoA's grants management office, office of budget and finance and program office. The information is not shared outside the agency, but is available under a Freedom on Information
17 Describe in detail the information the agency will collect, maintain, or disseminate and why and for what purpose the agency will use the information:	The system is not a database of personal information, but a repository of legacy data of the solicitation, review, award and post-award monitoring for grants funded under the Older Americans Act of 1965. The system contains contact information voluntarily
18 Describe the consent process:	The information was obtained from organizations or agencies that submitted grant applications for funding under the Older Americans Act of 1965.
19 Does the system host a website?	No
20 Does the website have any information or pages directed at children under the age of thirteen?	No
21 Are there policies or guidelines in place with regard to the retention and destruction of IIF?	Yes
22 Are there technical controls present?	Yes
23 Describe the IIF security controls:	Users of the FGS system requirie a user name and password to access the data.
24 Sr Official of Privacy Signature:	Harry Posman
25 Sr Official of Privacy Signoff Date:	Jul 5, 2006

Note on IIF: Any question about IIF seeks to identify any, and all, personal information associated with the system. This includes any IIF, whether or not it is subject to the Privacy Act, whether the individuals are employees, the public, research subjects, or business partners, and whether provided voluntarily or collected by mandate. Later questions will try to understand the character of the data and its applicability to the requirements under the Privacy Act or other legislation. Note: If no IIF is contained in the system, please answer the remaining required questions, then promote the PIA to the Sr. Privacy Official who will authorize the PIA. Note: If this system contains IIF, all remaining questions on the PIA Form Tabs must be completed prior to signature and promotion.

HHS Privacy Impact Assessment (PIA) Summary

AOA: AoA Grants Management System (GMS)

1

The following required questions represent the information necessary to complete the PIA Summary for transmission to the Office of Management and Budget. Note: If a question or its response is not applicable, please answer “No” to that question.

2

Summary of PIA Required Questions

Question	Response
1 System:	AoA Grants Management System (GMS)
2 Is this a new PIA?	No
3 If this is an existing PIA, please provide a reason for revision:	Initial PIA Migration to ProSight
4 Date of this Submission:	Feb 18, 2005
5 OPDIV Name:	AOA
6 Unique Project Identifier (UPI) Number:	2004- 009-75-04-01-02-1001-00; (2005-009-75-04-00-02-1001-00-207-087)
7 Privacy Act System of Records (SOR) Number:	N/A
8 OMB Information Collection Approval Number:	N/A
9 Other Identifying Number(s):	N/A
10 System Name:	Grants Management System (GMS)
11 System Point of Contact (POC). The System POC is the person to whom questions about the system and the responses to this PIA may be addressed:	Sue Banning
12 Provide an overview of the system:	The system is a repository of legacy data of the solicitation, review, award and post-award monitoring for grants funded under the Older Americans Act (OAA) prior to AoA's transition to GATES.
13 Indicate if the system is new or an existing one being modified:	Existing
14 Does/Will the system collect, maintain (store), disseminate and/or pass through IIF within any database(s), record(s), file(s) or website(s) hosted by this system?	Yes
15 Is the system subject to the Privacy Act?	No
16 If the system shares or discloses IIF please specify with whom and for what purpose(s):	The system shares contact information on grant applications internally with AoA's grants management office, office of budget and finance and program office. The information is not shared outside the agency, but is available under a Freedom on Information
17 Describe in detail the information the agency will collect, maintain, or disseminate and why and for what purpose the agency will use the information:	The system is not a database of personal information, but a repository of legacy data of the solicitation, review, award and post-award monitoring for grants funded under the Older Americans Act of 1965. The system contains contact information voluntari
18 Describe the consent process:	The information was obtained from organizations or agencies that submitted grant applications for funding under the Older Americans Act of 1965.
19 Does the system host a website?	No
20 Does the website have any information or pages directed at children under the age of thirteen?	No
21 Are there policies or guidelines in place with regard to the retention and destruction of IIF?	Yes
22 Are there technical controls present?	Yes
23 Describe the IIF security controls:	Users of the GMS system requirie a user name and password to access the data.
24 Sr Official of Privacy Signature:	Harry Posman
25 Sr Official of Privacy Signoff Date:	Jul 5, 2006

Note on IIF: Any question about IIF seeks to identify any, and all, personal information associated with the system. This includes any IIF, whether or not it is subject to the Privacy Act, whether the individuals are employees, the public, research subjects, or business partners, and whether provided voluntarily or collected by mandate. Later questions will try to understand the character of the data and its applicability to the requirements under the Privacy Act or other legislation. Note: If no IIF is contained in the system, please answer the remaining required questions, then promote the PIA to the Sr. Privacy Official who will authorize the PIA. Note: If this system contains IIF, all remaining questions on the PIA Form Tabs must be completed prior to signature and promotion.

HHS Privacy Impact Assessment (PIA) Summary

AOA: AoA National Aging Program Information System (NAPIS)_fisma

1

The following required questions represent the information necessary to complete the PIA Summary for transmission to the Office of Management and Budget. Note: If a question or its response is not applicable, please answer “No” to that question.

2

Summary of PIA Required Questions

Question	Response
1 System:	AoA National Aging Program Information System (NAPIS)_fisma
2 Is this a new PIA?	No
3 If this is an existing PIA, please provide a reason for revision:	Initial PIA Migration to ProSight
4 Date of this Submission:	Feb 28, 2005
5 OPDIV Name:	AOA
6 Unique Project Identifier (UPI) Number:	009-75-01-07-02-1002-00-101-003
7 Privacy Act System of Records (SOR) Number:	No
8 OMB Information Collection Approval Number:	No
9 Other Identifying Number(s):	No
10 System Name:	National Aging Program Information System (NAPIS)
11 System Point of Contact (POC). The System POC is the person to whom questions about the system and the responses to this PIA may be addressed:	Sue Banning
12 Provide an overview of the system:	The system compiles a collection of numeric data as specified and collected in questionnaires to State Ombudsmen and State Directors regarding monies allocated through grant funding and resulting impact of that funding. Existing
13 Indicate if the system is new or an existing one being modified:	
14 Does/Will the system collect, maintain (store), disseminate and/or pass through IIF within any database(s), record(s), file(s) or website(s) hosted by this system?	No
15 Is the system subject to the Privacy Act?	No
16 If the system shares or discloses IIF please specify with whom and for what purpose(s):	The system shares contact information internally with AoA's grants management office, office of budget and finance and program office. The information is not shared outside the agency, but is available under a Freedom on Information Act request.
17 Describe in detail the information the agency will collect, maintain, or disseminate and why and for what purpose the agency will use the information:	The system is not a database of personal information, but a repository of numerical data collected from the states and tribal organizations about monies allocated through grant funding under the Older Americans Act of 1965.
18 Describe the consent process:	No IIF is collected.
19 Does the system host a website?	No
20 Does the website have any information or pages directed at children under the age of thirteen?	No
21 Are there policies or guidelines in place with regard to the retention and destruction of IIF?	Yes
22 Are there technical controls present?	Yes
23 Describe the IIF security controls:	No IIF is contained in the system. It contains numerical data only.
24 Sr Official of Privacy Signature:	Harry Posman
25 Sr Official of Privacy Signoff Date:	Jul 5, 2006

Note on IIF: Any question about IIF seeks to identify any, and all, personal information associated with the system. This includes any IIF, whether or not it is subject to the Privacy Act, whether the individuals are employees, the public, research subjects, or business partners, and whether provided voluntarily or collected by mandate. Later questions will try to understand the character of the data and its applicability to the requirements under the Privacy Act or other legislation. Note: If no IIF is contained in the system, please answer the remaining required questions, then promote the PIA to the Sr. Privacy Official who will authorize the PIA. Note: If this system contains IIF, all remaining questions on the PIA Form Tabs must be completed prior to signature and promotion.

HHS Privacy Impact Assessment (PIA) Summary

AOA: AoA National Ombudsman Data Input Application (NORDIA)

1

The following required questions represent the information necessary to complete the PIA Summary for transmission to the Office of Management and Budget. Note: If a question or its response is not applicable, please answer “No” to that question.

2

Summary of PIA Required Questions

Question

Response

- 1 System:

AoA National Ombudsman Data Input Application (NORDIA)
- 2 Is this a new PIA?

No
- 3 If this is an existing PIA, please provide a reason for revision:

Initial PIA Migration to ProSight
- 4 Date of this Submission:

Feb 17, 2005
- 5 OPDIV Name:

AOA
- 6 Unique Project Identifier (UPI) Number:

2004 - 009-75-01-42-02-1004-00;
(2005-009-75-01-42-02-1002-00-202-070)
- 7 Privacy Act System of Records (SOR) Number:

N/A
- 8 OMB Information Collection Approval Number:

0985-0005
- 9 Other Identifying Number(s):

N/A
- 10 System Name:

National Ombudsman Report Data Input Application (NORDIA)
- 11 System Point of Contact (POC). The System POC is the person to whom questions about the system and the responses to this PIA may be addressed:

Sue Banning
- 12 Provide an overview of the system:

This is a stand alone system for external use by State Ombudsman for the purpose of collecting numeric data regarding monies allocated through formula grant funding under the Older Americans Act of 1965 and resulting impact of that funding. The applicati
Existing
- 13 Indicate if the system is new or an existing one being modified:

Existing
- 14 Does/Will the system collect, maintain (store), disseminate and/or pass through IIF within any database(s), record(s), file(s) or website(s) hosted by this system?

No
- 15 Is the system subject to the Privacy Act?

No
- 16 If the system shares or discloses IIF please specify with whom and for what purpose(s):

No personal information is collected. All information collected may be requested under the Freedom of Information Act. No personal information is collected. All information collected may be requested under the Freedom of Information Act.
- 17 Describe in detail the information the agency will collect, maintain, or disseminate and why and for what purpose the agency will use the information:

NORDIA is designed to collect aggregate data related to Title VII of the Older Americans Act of 1965. The application was designed for external use by the States Ombudsman Office to facilitate the collection and verification of Ombudsman program data. T
- 18 Describe the consent process:

No personal information is collected. All information collected may be requested under the Freedom of Information Act.
- 19 Does the system host a website?

No
- 20 Does the website have any information or pages directed at children under the age of thirteen?

No
- 21 Are there policies or guidelines in place with regard to the retention and destruction of IIF?

Yes
- 22 Are there technical controls present?

No
- 23 Describe the IIF security controls:

No personal information is collected. All information collected may be requested under the Freedom of Information Act.
- 24 Sr Official of Privacy Signature:

Harry Posman
- 25 Sr Official of Privacy Signoff Date:

Jul 5, 2006

Note on IIF: Any question about IIF seeks to identify any, and all, personal information associated with the system. This includes any IIF, whether or not it is subject to the Privacy Act, whether the individuals are employees, the public, research subjects, or business partners, and whether provided voluntarily or collected by mandate. Later questions will try to understand the character of the data and its applicability to the requirements under the Privacy Act or other legislation. Note: If no IIF is contained in the system, please answer the remaining required questions, then promote the PIA to the Sr. Privacy Official who will authorize the PIA. Note: If this system contains IIF, all remaining questions on the PIA Form Tabs must be completed prior to signature and promotion.

HHS Privacy Impact Assessment (PIA) Summary

AOA: AoA State Program Report Data Input Application (SPRDIA)

1	
The following required questions represent the information necessary to complete the PIA Summary for transmission to the Office of Management and Budget. Note: If a question or its response is not applicable, please answer “No” to that question.	
2	Summary of PIA Required Questions

Question	Response
1 System:	AoA State Program Report Data Input Application (SPRDIA)
2 Is this a new PIA?	No
3 If this is an existing PIA, please provide a reason for revision:	Initial PIA Migration to ProSight
4 Date of this Submission:	Feb 17, 2005
5 OPDIV Name:	AOA
6 Unique Project Identifier (UPI) Number:	2004 - 009-75-01-42-02-1003-00
7 Privacy Act System of Records (SOR) Number:	N/A
8 OMB Information Collection Approval Number:	0985-0008
9 Other Identifying Number(s):	N/A
10 System Name:	State Program Report Data Input Application (SPRDIA)
11 System Point of Contact (POC). The System POC is the person to whom questions about the system and the responses to this PIA may be addressed:	Sue Banning
12 Provide an overview of the system:	SPRDIA is a stand-alone PC application designed to collect and format aggregate data about the funding spent and clients served from grants authorized under Title III of the Older Americans Act of 1965. The application was designed for external use by the Existing
13 Indicate if the system is new or an existing one being modified:	
14 Does/Will the system collect, maintain (store), disseminate and/or pass through IIF within any database(s), record(s), file(s) or website(s) hosted by this system?	No
15 Is the system subject to the Privacy Act?	No
16 If the system shares or discloses IIF please specify with whom and for what purpose(s):	No personal information is collected. All information collected may be requested under the Freedom of Information Act. No personal information is collected. All information collected may be requested under the Freedom of Information Act.
17 Describe in detail the information the agency will collect, maintain, or disseminate and why and for what purpose the agency will use the information:	SPRDIA is designed to collect aggregate data for three areas related to services provided by the state to the elderly with Title III grant money: service provider information, client detail information and Title III expenditure information. State servic
18 Describe the consent process:	No personal information is collected. All information collected may be requested under the Freedom of Information Act.
19 Does the system host a website?	No
20 Does the website have any information or pages directed at children under the age of thirteen?	No
21 Are there policies or guidelines in place with regard to the retention and destruction of IIF?	Yes
22 Are there technical controls present?	No
23 Describe the IIF security controls:	No personal information is collected. All information collected may be requested under the Freedom of Information Act.
24 Sr Official of Privacy Signature:	Harry Posman
25 Sr Official of Privacy Signoff Date:	Jul 5, 2006

Note on IIF: Any question about IIF seeks to identify any, and all, personal information associated with the system. This includes any IIF, whether or not it is subject to the Privacy Act, whether the individuals are employees, the public, research subjects, or business partners, and whether provided voluntarily or collected by mandate. Later questions will try to understand the character of the data and its applicability to the requirements under the Privacy Act or other legislation. Note: If no IIF is contained in the system, please answer the remaining required questions, then promote the PIA to the Sr. Privacy Official who will authorize the PIA. Note: If this system contains IIF, all remaining questions on the PIA Form Tabs must be completed prior to signature and promotion.



HHS Privacy Impact Assessment (PIA) Summary

AOA: AoA Title VI, Electronic Reporting for Native Americans and Alaskan Natives Programs (Title VI)

1

The following required questions represent the information necessary to complete the PIA Summary for transmission to the Office of Management and Budget. Note: If a question or its response is not applicable, please answer “No” to that question.

2Summary of PIA Required Questions

Question

Response

- 1

System:
- 2

Is this a new PIA?
- 3

If this is an existing PIA, please provide a reason for revision:
- 4

Date of this Submission:
- 5

OPDIV Name:
- 6

Unique Project Identifier (UPI) Number:
- 7

Privacy Act System of Records (SOR) Number:
- 8

OMB Information Collection Approval Number:
- 9

Other Identifying Number(s):
- 10

System Name:
- 11

System Point of Contact (POC). The System POC is the person to whom questions about the system and the responses to this PIA may be addressed:
- 12

Provide an overview of the system:
- 13

Indicate if the system is new or an existing one being modified:
- 14

Does/Will the system collect, maintain (store), disseminate and/or pass through IIF within any database(s), record(s), file(s) or website(s) hosted by this system?
- 15

Is the system subject to the Privacy Act?
- 16

If the system shares or discloses IIF please specify with whom and for what purpose(s):
- 17

Describe in detail the information the agency will collect, maintain, or disseminate and why and for what purpose the agency will use the information:
- 18

Describe the consent process:
- 19

Does the system host a website?
- 20

Does the website have any information or pages directed at children under the age of thirteen?
- 21

Are there policies or guidelines in place with regard to the retention and destruction of IIF?
- 22

Are there technical controls present?
- 23

Describe the IIF security controls:
- 24

Sr Official of Privacy Signature:
- 25

Sr Official of Privacy Signoff Date:
- AoA Title VI, Electronic Reporting for Native Americans and Alaskan Natives Programs (Title VI)

No

Initial PIA Migration to ProSight

Feb 22, 2005

AOA

2004- 009-75-04-01-02-1001-00;
(2005-009-75-04-00-02-1001-00-207-087)

N/A

0985-0007

N/A

Title VI GMS (Grants Management System)

Sue Banning

This system is a repository of legacy data of the solicitation, review, award and post-award monitoring for grants for tribal organizations funded under Title VI of the Older Americans Act of 1965. AoA currently uses GATES for grant application tracking

Existing

Yes

No

The system shares contact information on grant applications internally with AoA's grants management office, office of budget and finance and program office. The information is not shared outside the agency, but is available under a Freedom on Informatio

The system is not a database of personal information, but a repository of legacy data of the solicitation, review, award and post-award monitoring for grants funded under the Older Americans Act of 1965. The system contains contact information voluntarily

The information was obtained from organizations or agencies that submitted grant applications for funding under the Older Americans Act of 1965.

No

No

Yes

Yes

Users of the Title VI GMS system requirie a user name and password to access the data.

Harry Posman

Jul 5, 2006

Note on IIF: Any question about IIF seeks to identify any, and all, personal information associated with the system. This includes any IIF, whether or not it is subject to the Privacy Act, whether the individuals are employees, the public, research subjects, or business partners, and whether provided voluntarily or collected by mandate. Later questions will try to understand the character of the data and its applicability to the requirements under the Privacy Act or other legislation. Note: If no IIF is contained in the system, please answer the remaining required questions, then promote the PIA to the Sr. Privacy Official who will authorize the PIA. Note: If this system contains IIF, all remaining questions on the PIA Form Tabs must be completed prior to signature and promotion.